

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE CELESTICA INC. SEC. LITIG.

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Civil Action No.: 07-CV-00312-GBD
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(ECF CASE)
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Hon. George B. Daniels
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X

**DECLARATION OF JOSEPH A. FONTI IN SUPPORT OF
LEAD PLAINTIFFS' MEMORANDUM OF LAW IN OPPOSITION
TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

Joseph A. Fonti, Esq., declares as follows pursuant to 28 U.S.C. § 1746:

1. I am a member of the law firm of Labaton Sucharow LLP. I submit this declaration in support of Lead Plaintiffs' Memorandum of Law in Opposition to Defendants' Motion for Summary Judgment.
2. Annexed hereto are true and correct copies of the following documents identified as Plaintiffs Exhibits ("POSJ") in the accompanying Lead Plaintiffs' Memorandum of Law in Opposition to Defendants' Motion for Summary Judgment, filed herewith:¹

¹ Pursuant to the Stipulated Protective Order (ECF No. 93), all "confidential" documents filed herein have been filed conditionally under seal.

Exhibit	Description
POSJ 1	Exhibit 2 to the Deposition of Paul Nicoletti, CEL00051816
POSJ 2	CEL00063661
POSJ 3	CEL00054202
POSJ 4	CEL00375782
POSJ 5	CEL00028966
POSJ 6	CEL00029193
POSJ 7	CEL00029178
POSJ 8	Exhibit 3 to the Deposition of Robert Crandall, CEL00046744
POSJ 9	Exhibit 11 to the Deposition of Frank Binder, CEL00259635
POSJ 10	Excerpts from the March 13, 2013 Deposition of Frank Binder
POSJ 11	Excerpts from the April 12, 2013 Deposition of Anthony Puppi
POSJ 12	Exhibit 42 to the Deposition of Anthony Puppi, CEL00046743

Exhibit	Description
POSJ 13	CEL00424608
POSJ 14	CEL00211136
POSJ 15	Exhibit 28 to the Deposition of Richard Burden, CEL00026950
POSJ 16	CEL00417912 attaching CEL00417914
POSJ 17	Exhibit 1 to the Deposition of Stephen Delaney, CEL00006407
POSJ 18	Exhibit 2 to the Deposition of Stephen Delaney, CEL00008584
POSJ 19	Excerpts from the December 7, 2012 Deposition of William Etherington
POSJ 20	Excerpts from the December 4, 2012 Deposition of Robert Crandall
POSJ 21	Exhibit 2 to the Deposition of Michael Homer, CEL00052350
POSJ 22	CEL00074737

Exhibit	Description
POSJ 23	CEL00028585
POSJ 24	CEL00040174 and attachment CEL00040177
POSJ 25	CEL00075026
POSJ 26	Exhibit 3 to the Deposition of Stephen Delaney, CEL00008622
POSJ 27	Excerpted Exhibit 4 to the Deposition of Stephen Delaney, CEL00006489
POSJ 28	CEL00075527
POSJ 29	Exhibit 6 to the Deposition of Stephen Delaney, CEL00008654
POSJ 30	Exhibit 46 to the Deposition of Anthony Puppi, CEL00052637
POSJ 31	CEL00007090

Exhibit	Description
POSJ 32	Excerpts from the April 23, 2013 Deposition of Michael Homer
POSJ 33	CEL00076091
POSJ 34	CEL00076100
POSJ 35	CEL00065831
POSJ 36	Selected Exhibits from the Expert Report of Robert G. Freid, dated June 26, 2013
POSJ 37	Excerpted Expert Report of Robert G. Freid, dated June 26, 2013
POSJ 38	CEL00056265
POSJ 39	Exhibit 6 to the Deposition of Alcatel Lucent, ALCATEL-LUCENT000358
POSJ 40	Exhibit 2 to the Deposition of Avaya, AVAYA000189

Exhibit	Description
POSJ 41	CEL00066076
POSJ 42	CEL00066082
POSJ 43	CEL00050848 and attachment CEL00050849
POSJ 44	CEL00282879
POSJ 45	CEL00190159
POSJ 46	CEL00190160
POSJ 47	Exhibit 8 to the Deposition of Stephen Delaney, CEL00008675
POSJ 48	Exhibit 1 to the Deposition of William Etherington, CEL00077093
POSJ 49	CEL00007561

Exhibit	Description
POSJ 50	CEL00077293
POSJ 51	CEL00077846
POSJ 52	CEL00077914
POSJ 53	Exhibit 2 to the Deposition of Peter Bar, CEL00024176
POSJ 54	Exhibit 3 to the Deposition of Antonio Fernandez-Stoll, CEL00046661
POSJ 55	Excerpts from the January 29, 2013 Deposition of Antonio Fernandez-Stoll
POSJ 56	Exhibit 9 to the Deposition of Stephen Delaney, CEL00008706
POSJ 57	Exhibit 10 to the Deposition of Stephen Delaney, CEL00114235
POSJ 58	Excerpts from the April 30, 2013 Deposition of Stephen Delaney

Exhibit	Description
POSJ 59	Exhibit 15 to the Deposition of Antonio Fernandez-Stoll, CEL00068031
POSJ 60	Exhibit 3 to the Deposition of Michael Homer, CEL00078843
POSJ 61	Exhibit 3 to the Deposition of Peter Bar, CEL00024287
POSJ 62	CEL00067444
POSJ 63	Exhibit 47 to the Deposition of Anthony Puppi, CEL00282960
POSJ 64	Exhibit 12 to the Deposition of Stephen Delaney, CEL00008717
POSJ 65	Exhibit 18 to the Deposition of Robert Crandall, CEL00483180
POSJ 66	Exhibit 5 to the Deposition of Richard Burden, CEL00051871
POSJ 67	CEL00079165

Exhibit	Description
POSJ 68	CEL00007679
POSJ 69	CEL00067666
POSJ 70	CEL00056636
POSJ 71	CEL00024379
POSJ 72	CEL00068464
POSJ 73	Exhibit 2 to the Deposition of John Boucher, CEL00028136
POSJ 74	Exhibit 4 to the Deposition of Antonio Fernandez-Stoll, CEL00056770
POSJ 75	Exhibit 1 to the Deposition of Robert Crandall, CEL00047797
POSJ 76	Exhibit 2 to the Deposition of Robert Crandall, CEL00068508

Exhibit	Description
POSJ 77	Exhibit 7 to the Deposition of Michael Homer, CEL00080730
POSJ 78	Exhibit 6 to the Deposition of Antonio Fernandez-Stoll, CEL00068511
POSJ 79	Exhibit 42 to the Deposition of Stephen Delaney, CEL00080970
POSJ 80	Exhibit 43 to the Deposition of Stephen Delaney, CEL00100518
POSJ 81	Exhibit 16 to the Deposition of Stephen Delaney, CEL00068845
POSJ 82	Exhibit 15 to the Deposition of Stephen Delaney, CEL00068841
POSJ 83	Exhibit 44 to the Deposition of Stephen Delaney, CEL00047423
POSJ 84	Exhibit 1 to the Deposition of Frank Binder, CEL00056960
POSJ 85	Exhibit 4 to the Deposition of John Boucher, CEL00051874

Exhibit	Description
POSJ 86	Exhibit 24 to the Deposition of Peter Bar, CEL00210429
POSJ 87	CEL00255029
POSJ 88	CEL00100733
POSJ 89	CEL00100735
POSJ 90	Exhibit 17 to the Deposition of Stephen Delaney, CEL00362743
POSJ 91	Exhibit 18 to the Deposition of Stephen Delaney, CEL00069132
POSJ 92	Exhibit 43 to the Deposition of Anthony Puppi, CEL00047208
POSJ 93	Exhibit 16 to the Deposition of Frank Binder, CEL00047431
POSJ 94	CEL00061136

Exhibit	Description
POSJ 95	CEL00061140
POSJ 96	CEL00061145
POSJ 97	Exhibit 25 to the Deposition of Paul Nicoletti, CEL00041640
POSJ 98	CEL00101176
POSJ 99	CEL00101177
POSJ 100	Exhibit 24 to the Deposition of Paul Nicoletti, CEL00101291
POSJ 101	CEL00118671
POSJ 102	CEL00082048
POSJ 103	Exhibit 5 to the Deposition of Frank Binder, CEL00062077

Exhibit	Description
POSJ 104	CEL00041723
POSJ 105	CEL00069704
POSJ 106	Exhibit 17 to the Deposition of Frank Binder, CEL00057298
POSJ 107	Exhibit 19 to the Deposition of Stephen Delaney, CEL00007747
POSJ 108	Exhibit 20 to the Deposition of Stephen Delaney, CEL00008744
POSJ 109	Excerpts from the Expert Report of Chad Coffman, CFA, dated June 14, 2013
POSJ 110	Exhibit 21 to the Deposition of Stephen Delaney, CEL00057305
POSJ 111	Exhibit 7 to the Deposition of Antonio Fernandez-Stoll, CEL00119920
POSJ 112	CEL00082938

Exhibit	Description
POSJ 113	Exhibit 48 to the Deposition of Stephen Delaney, CEL00102382
POSJ 114	Exhibit 23 to the Deposition of Frank Binder, CEL00045500
POSJ 115	CEL00057355
POSJ 116	Exhibit 20 to the Deposition of Paul Nicoletti, CEL00045512
POSJ 117	CEL00102849 and attachment CEL00102850
POSJ 118	Exhibit 7 to the Deposition of Frank Binder, CEL00047549
POSJ 119	CEL00103312
POSJ 120	Exhibit 17 to the Deposition of Anthony Puppi, CEL00057390
POSJ 121	Exhibit 13 to the Deposition of Michael Homer, CEL00083664

Exhibit	Description
POSJ 122	CEL00083686
POSJ 123	CEL00325272
POSJ 124	CEL00325276
POSJ 125	Exhibit 17 to the Deposition of Peter Bar, CEL00042311
POSJ 126	CEL00042382
POSJ 127	Exhibit 23 to the Deposition of Stephen Delaney, CEL00057484
POSJ 128	Exhibit 18 to the Deposition of Peter Bar, CEL00057450
POSJ 129	Exhibit 18 to the Deposition of Anthony Puppi, CEL00008773
POSJ 130	CEL00042573

Exhibit	Description
POSJ 131	Excerpted Exhibit 24 to the Deposition of Stephen Delaney, CEL00007814
POSJ 132	CEL00057673
POSJ 133	CEL00057678
POSJ 134	Exhibit 15 to the Deposition of Paul Nicoletti, CEL00023096
POSJ 135	Exhibit 2 to the Deposition of Frank Binder, CEL00047251
POSJ 136	CEL00057680
POSJ 137	Exhibit 18 to the Deposition of Frank Binder, CEL00084831
POSJ 138	Exhibit 13 to the Deposition of Alcatel Lucent, CEL00043011
POSJ 139	Exhibit 21 to the Deposition of Michael Homer, CEL00084974

Exhibit	Description
POSJ 140	Exhibit 25 to the Deposition of Stephen Delaney, CEL00117960
POSJ 141	CEL00084974 and attachment CEL00084976
POSJ 142	CEL00428521
POSJ 143	Exhibit 45 to the Deposition of Stephen Delaney, CEL00071237
POSJ 144	CEL00015734
POSJ 145	CEL00043281 and attachment CEL00043283
POSJ 146	CEL00057744
POSJ 147	Exhibit 9 to the Deposition of Frank Binder, CEL00476063
POSJ 148	Exhibit 13 to the Deposition of Robert Crandall, CEL00057780

Exhibit	Description
POSJ 149	Exhibit 27 to the Deposition of Anthony Puppi, CEL00061353
POSJ 150	CEL00057791
POSJ 151	Exhibit 14 to the Deposition of Robert Crandall, CEL00012885
POSJ 152	Exhibit 27 to the Deposition of Stephen Delaney, CEL00008216
POSJ 153	Exhibit 28 to the Deposition of Stephen Delaney, CEL00008795
POSJ 154	Excerpts of January 9, 2013 Deposition of Paul Nicoletti
POSJ 155	CEL00484043
POSJ 156	Exhibit 25 to the Deposition of Michael Homer, CEL00086022
POSJ 157	Exhibit 31 to the Deposition of Stephen Delaney, CEL00357573

Exhibit	Description
POSJ 158	Exhibit 23 to the Deposition of Michael Homer, CEL00086169
POSJ 159	Exhibit 15 to the Deposition of Michael Homer, CEL00086225
POSJ 160	CEL00119419
POSJ 161	CEL00118071
POSJ 162	Exhibit 29 to the Deposition of Anthony Puppi, CEL00057998
POSJ 163	Exhibit 22 to the Deposition of Michael Homer, CEL00087332
POSJ 164	Exhibit 26 to the Deposition of Michael Homer, CEL00087056
POSJ 165	CEL00073340
POSJ 166	CEL00073344

Exhibit	Description
POSJ 167	CEL00076418
POSJ 168	Exhibit 5 to the Deposition of William Etherington, CEL00307343
POSJ 169	Exhibit 44 to the Deposition of Anthony Puppi, CEL00047371
POSJ 170	Exhibit 17 to the Deposition of Michael Homer, CEL00087352
POSJ 171	CEL00048587
POSJ 172	CEL00019982
POSJ 173	Exhibit 32 to the Deposition of Stephen Delaney, CEL00060403
POSJ 174	CEL00118169
POSJ 175	Exhibit 6 to the Deposition of Robert Crandall, CEL00061723

Exhibit	Description
POSJ 176	CEL00194463
POSJ 177	Exhibit 20 to the Deposition of Robert Crandall, CEL000483449
POSJ 178	CEL00074413
POSJ 179	CEL00047644
POSJ 180	Exhibit 32 to the Deposition of Anthony Puppi, CEL00058853
POSJ 181	Exhibit 34 to the Deposition of Stephen Delaney, CEL00008261
POSJ 182	Exhibit 28 to the Deposition of Paul Nicoletti, CEL00186468
POSJ 183	Exhibit 4 to the Deposition of Panasonic, CEL00119593
POSJ 184	Exhibit 21 to the Deposition of Robert Crandall, CEL000483449

Exhibit	Description
POSJ 185	Exhibit 32 to the Deposition of Paul Nicoletti, CEL00031835
POSJ 186	CEL00059059
POSJ 187	Exhibit 33 to the Deposition of Paul Nicoletti, CEL00031874
POSJ 188	Exhibit 46 to the Deposition of Stephen Delaney, CEL00109022
POSJ 189	Exhibit 11 to the Deposition of Paul Nicoletti. CEL00031963
POSJ 190	Exhibit 14 to the Deposition of William Etherington, CEL00033881
POSJ 191	Exhibit 47 to the Deposition of Stephen Delaney, CEL00396429
POSJ 192	CEL00219657
POSJ 193	Exhibit 9 to the Deposition of Gerald Schwartz, CEL00483582

Exhibit	Description
POSJ 194	Exhibit 11 to the Deposition of Robert Crandall, CEL00032356
POSJ 195	Exhibit 12 to the Deposition of Robert Crandall, CEL00034034
POSJ 196	Exhibit 51 to the Deposition of Stephen Delaney, CEL00399064
POSJ 197	Exhibit 50 to the Deposition of Stephen Delaney, CEL00396296
POSJ 198	Exhibit 14 to the Deposition of Panasonic, CEL00152841
POSJ 199	CEL00059944
POSJ 200	CEL00059948
POSJ 201	Exhibit 19 to the Deposition of Peter Bar, CEL00023031
POSJ 202	Exhibit 23 to the Deposition of Robert Crandall, CEL004838

Exhibit	Description
POSJ 203	Exhibit 38 to the Deposition of Stephen Delaney, CEL00045710
POSJ 204	Exhibit 12 to the Deposition of Frank Binder, CEL00218573
POSJ 205	CEL00032674
POSJ 206	Exhibit 14 to the Deposition of Gerald Schwartz, CEL00483845
POSJ 207	Exhibit 15 to the Deposition of Gerald Schwartz, CEL00483846
POSJ 208	Exhibit 13 to the Deposition of Frank Binder, CEL00399824
POSJ 209	CEL00036772
POSJ 210	CEL00188624
POSJ 211	CEL00063187 attaching CEL00063190

Exhibit	Description
POSJ 212	Exhibit 22 to the Deposition of John Boucher, CEL00110914
POSJ 213	Exhibit 51 to the Deposition of Anthony Puppi, CEL00307832
POSJ 214	Exhibit 40 to the Deposition of Stephen Delaney, CEL00008845
POSJ 215	Excerpts from the April 17, 2013 Deposition of Eric Lundquist
POSJ 216	CEL00034956
POSJ 217	Exhibit 41 to the Deposition of Steve Delaney
POSJ 218	Exhibit 26 to the Deposition of Robert Crandall, CEL00482496
POSJ 219	Exhibit 28 to the Deposition of Robert Crandall, CEL00482633
POSJ 220	Exhibit 11 to the Deposition of Gerald Schwartz, CEL00399769

Exhibit	Description
POSJ 221	Exhibit 13 to the Deposition of Paul Nicoletti, CEL00023096
POSJ 222	Exhibit 14 to the Deposition of Paul Nicoletti, CEL00035156
POSJ 223	Excerpts from the March 21, 2013 Deposition of Gerald Schwartz
POSJ 224	Exhibit 30 to the Deposition of Robert Crandall, CEL00482728
POSJ 225	Exhibit to 17 the Deposition of Panasonic CEL00033321
POSJ 226	CEL00033460
POSJ 227	Exhibit 15 to the Deposition of Peter Bar, CEL00033448
POSJ 228	Exhibit 39 to the Deposition of Anthony Puppi, CEL00008355
POSJ 229	Exhibit 18 to the Deposition of Thomas Porter, CEL00219658

Exhibit	Description
POSJ 230	Exhibit 13 to the Deposition of Gerald Schwartz, CEL00482173
POSJ 231	Exhibit 40 to the Deposition of Anthony Puppi, CEL00008872
POSJ 232	Exhibit 20 to the Deposition of Peter Bar, CEL00035352
POSJ 233	CEL00178025 attaching CEL00178028
POSJ 234	CEL00231794
POSJ 235	CEL00200099
POSJ 236	Exhibit 15 to the Deposition of Frank Binder, CEL00023183
POSJ 237	Exhibit 17 to the Deposition of Thomas Porter, CEL00121631
POSJ 238	Exhibit 16 to the Deposition of Peter Bar, CEL00024287

Exhibit	Description
POSJ 239	Exhibit 18 to the Deposition of Paul Nicoletti, CEL00035589
POSJ 240	CEL00008364
POSJ 241	CEL00008889
POSJ 242	Exhibit 11 to the Deposition of Alcatel-Lucent, Alcatel-Lucent 011586
POSJ 243	Excerpts from the February 8, 2013 Deposition of Richard Burden
POSJ 244	Excerpts from the Expert Report of Greg J. Regan, dated June 28, 2013
POSJ 245	Exhibit 12 to the Deposition of Thomas Porter, CEL00121324
POSJ 246	CEL00215404
POSJ 247	Exhibit 38 to the Deposition of Peter Bar, CEL00220294

Exhibit	Description
POSJ 248	Excerpts from the September 26, 2013, Deposition of Thomas Porter
POSJ 249	CLS-DALI-00213 attaching CLS-DALI-00215
POSJ 250	CLS-MILL-00141
POSJ 251	CLS-CARP-00262
POSJ 252	Excerpts from the Expert Report of Vinita M. Juneja, Ph.D., dated August 6, 2013
POSJ 253	Excerpts from the Expert Report of Chad Coffman, CFA, in Reply to the Expert Report of Dr. Vinita M. Juneja Dated August 6, 2013, dated September 10, 2013
POSJ 254	Exhibit 53 to the Deposition of Stephen Delaney, CEL00006407
POSJ 255	Exhibit 23 to the Deposition of Peter Bar, CEL00024176
POSJ 256	CEL00073772

Exhibit	Description
POSJ 257	Exhibit 35 to the Deposition of Stephen Delaney, CEL00008819
POSJ 258	CEL00050592
POSJ 259	CEL00188671
POSJ 260	Excerpts from the June 4, 2013 Deposition of Peter Bar
POSJ 261	Exhibit 33 to the Deposition of Peter Bar, CEL00213599
POSJ 262	Exhibit 34 to the Deposition of Peter Bar, CEL00213784
POSJ 263	Exhibit 13 to the Deposition of Avaya, CEL00187331
POSJ 264	Exhibit 15 to the Deposition of Avaya
POSJ 265	CEL00082559

Exhibit	Description
POSJ 266	CEL00102684
POSJ 267	Exhibit 11 to the Deposition of Donna Singh, CEL00282939
POSJ 268	CEL00190702
POSJ 269	CEL00036208
POSJ 270	Excerpts from the Rebuttal Report of Greg J. Regan, dated October 2, 2013

I declare under penalty of perjury that the foregoing is true and correct. Executed
on December 20, 2013.


JOSEPH A. FONTI

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE CELESTICA INC. SEC. LITIG.

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Civil Action No.: 07-CV-00312-GBD

(ECF CASE)

Hon. George B. Daniels

CERTIFICATE OF SERVICE

I certify under penalty of perjury pursuant to 28 U.S.C. § 1746 that on December 20, 2013, I caused to be served upon the following, by electronic mail, a true copy of the Declaration of Joseph A. Fonti in Support of Lead Plaintiffs' Memorandum of Law in Opposition to Defendants' Motion For Summary Judgment and accompanying exhibits.

Phillip A. Geraci, Esq (phillip.geraci@kayescholer.com)
Kaye Scholer
425 Park Avenue
New York, NY 10022-3598
United States

Dated: December 20, 2013



Joseph A. Fonti